

### REMARKS

In the Office Action, claims 1-6, 9, 16, 19, 20, 23, 25 and 28 are rejected under 35 U.S.C. §103(a) as being unpatentable over Kikuchi et al. (US 5,506,375) in view of Yamanami et al. (4,878,553), claims 10-11 are rejected under 35 U.S.C. §103(a) as being unpatentable over Kikuchi et al. (US 5,506,375) in view of Yamanami et al. (4,878,553), and further in view of Yamanami et al. (US 2002/0044208), and claims 21 and 24 are rejected under 35 U.S.C. §103(a) as being unpatentable over Kikuchi et al. (US 5,506,375) in view of Yamanami et al. (4,878,553), and further in view of Keely et al (US 2002/0063694).

In response to the final office action, claim 1 is further amended to include the limitation that each electromagnetic induction layer has a wire lattice comprising: a single first wire wound on said wire lattice, said first wire being wound with multiple turns to form a plurality of equally spaced latitudes across said wire lattice; and a single second wire interlaced with said first wire, said second wire being wound with multiple turns to form a plurality of equally spaced longitudes across said wire lattice. Applicant respectfully submits that the amended claim should be allowable and the following discussion will elucidate the allowability over the cited prior arts.

First of all, in the instant invention, as can be seen in the drawings and specification, each electromagnetic induction layer comprises both first and second wires wound in orthogonal directions and insulated from each other. Although the examiner cites fig.9, elements 81 and 82 of Yamanami as having disclosed first and second wires, applicant respectfully contends that the citation is unwarranted because fig.

9 of Yamanami clearly shows elements 81 and 82 as two separate electromagnetic induction layers each having a first wire or a second wire instead of one electromagnetic induction layer having both first and second wires. It is evident that neither Kikuchi nor Yamanami discloses such a feature as claimed in claim 1.

In the office action, the examiner cites Yamanami as having disclosed the winding wires (fig. 2, multiple (2) turns) of the previously presented claim 1. As pointed out in the remarks dated 06/25/2008, Yamanami merely discloses multiple “loop coils” arranged in parallel in such a manner as to partially overlap the adjacent loop coils. To distinguish over Yamanami, the currently amended claim 1 specifically recites “a single first wire ... wound ... to form a plurality of equally spaced latitudes across said wire lattice”. It is clear that although each loop coil of Yamanami may have two turns, a single loop coil with two turns can not form “equally spaced latitudes” which require at least three latitudes to have two equal spaces among them. Applicant respectfully submits that the amended claim 1 and its dependent claims should be allowable with the limitation neither disclosed nor suggested by both Yamanami and Kikuchi.

The examiner also rejects claim 9 on the ground that Kikuchi discloses more than one induction layer overlaid together and the induction cells on each induction layer are interlaced one another, and the induction cells on each induction layer are at the same or different intervals (see fig. 2, (20) and (21)). Applicant respectfully disagrees with the examiner’s statement because elements (20) and (21) of Kikuchi are two separate induction layers each only have wires running in one direction as clearly illustrated in the

figure, and each induction layer of Kikuchi can't form an induction cell with wires running only in one direction. As defined in claim 1 of the instant invention, each induction cell being a space surrounded by two adjacent longitudes and two adjacent latitudes. For the art of Kikuchi to form an induction cell, the two elements (20) and (21) have to be overlaid. In other words, only by combining both elements (20) and (21) can induction cells of one size be formed in the combined elements. There exist no induction cells in each separate element (20) or (21). Therefore, it would not be logical for a person skilled in the art to take elements (20) and (21) as having disclosed the limitation of claim 9, i.e., the size of each induction cell on one electromagnetic induction layer is different from the size of each induction cell on another electromagnetic induction layer.

The foregoing analysis and discussion has clearly elucidated that the instant invention differs from the cited prior arts. The physical difference results in different effects and is not obvious. Claims 1-6, 9-11, 16, 19, 20, 21, 23, 25 and 28 are in full condition for allowance. Prompt and favorable reconsideration of the application is respectfully solicited.

Respectfully submitted,

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